

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION
IN ADMIRALTY

Tiffany N. Provence, as the Personal)	C/A No. 2:21-cv-00965-RMG
Representative of the Estate of Juan Antonio)	
Villalobos Hernandez,)	
)	
Plaintiff,)	
)	
Versus)	
)	
United States of America, Crowley Maritime)	
Corporation, Crowley Government Services,)	
Inc., Detyens Shipyards, Inc., and Hightrak)	
Staffing, Inc. d/b/a HiTrak Staffing, Inc.,)	
)	
Defendants.)	

MOTION FOR ENTRY OF CONFIDENTIALITY ORDER

CONSENT:

The attached proposed Confidentiality Order is requested:

- ☒ by consent of all parties.
- ☐ by consent as to some, but not all, of the terms [alternative provisions are set forth in both proposed and redlined versions].
- ☐ by some, but not all, parties [requesting parties include: [requesting parties]].

CONTENT:

The attached proposed Confidentiality Order:

- ☐ is identical to the standard form on the court's website.
- ☒ has been revised by deleting the Reading Room provision, but no other changes have been made (*redlined copy not required*).
- ☐ is a modified version of the standard form on the court's website and the modifications have been indicated by attaching a "redlined" copy the document. An explanation of the basis for each proposed modification is as follows:

[explain requested changes with reference to relevant paragraph numbers]

WE SO MOVE

s/ James B. Hood

James B. Hood (9130)
james.hood@hoodlaw.com
Kathryn N. Tanner (13616)
katie.tanner@hoodlaw.com
HOOD LAW FIRM, LLC
172 Meeting Street/Post Office Box 1508
Charleston, SC 29402
P: (843) 577-4435/F: (843) 722-1630

*Counsel for Defendants Detyens Shipyards, Inc.
and HighTrak Staffing, Inc. d/b/a HiTrak
Staffing, Inc.*

WE SO MOVE/CONSENT

s/ Ryan Daniel Gilsenan

Ryan Daniel Gilsenan (9837)
gilsenan@hinesandgilsenan.com
Julius H. Hines (5807)
hines@hinesandgilsenan.com
Edward N. Smith (13429)
smith@hinesandgilsenan.com
Hines and Gilsenan LLC
1535 Hobby St, Ste 203
North Charleston, SC 29405
843-847-8003

*Counsel for Defendants United States of America,
Crowley Maritime Corporation, Crowley
Government Services, Inc.*

WILLIAM JORDAN
MICHELLE DELEMARRE
U.S. Department of Justice
Civil Division, Torts Branch
Aviation & Admiralty Litigation
P.O. Box 14271
Washington, D.C. 20044-4271

Attorneys for the United States

*Instructions for use of the Consent Confidentiality Order can be found at the court's website at
www.scd.uscourts.gov under "forms" or under each individual judge's forms list.*

WE SO MOVE/CONSENT

s/ J. Rutledge Young, III

J. Rutledge Young, III
ryoung@duffyandyoung.com
Julie L. Moore
jmoore@duffyandyoung.com
Robert L. Wehrman
rwehrman@duffyandyoung.com
Duffy & Young LLC
96 Broad Street
Charleston SC 29401
P: 843-720-2044/ F: 843-720-2047

*Counsel for Plaintiff Tiffany N. Provence, as
the Personal Representative of the Estate of
Juan Antonia Villalobos Hernandez*